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PROPER PERSON

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

FERNANDO HARO III, an individual;
Plaintiff,

vs.

KRM, INC. d.b.a. "THOMAS KELLER
RESTAURANT GROUP", a foreign
corporation; and KVP, LP d.b.a. "BOUCHON
AT THE VENETIAN," a foreign Limited
Liability Company;

Defendants.

CASE NO.: 2:20-cv-02113-APG-DJA

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE OPPOSITION
TO MOTIONS TO DISMISS**

SECOND REQUEST

Pro se Plaintiff Fernando Haro III ("Plaintiff") and Defendants KRM, Inc, d.b.a. Thomas Keller Restaurant Group and KVP, LP d.b.a. Bouchon Restaurant (collectively, "Defendants"), by and through their attorneys, hereby stipulate and agree as follows:

1. Plaintiff filed his Complaint on November 16, 2020.

2. Plaintiff filed his First Amended Complaint on February 21, 2021.

3. Pursuant to Court Order [ECF No. 17], Defendant's deadline to file their responses to Plaintiff's First Amended Complaint was June 21, 2021.

4. On June 21, 2021, the parties filed a stipulation to extend Defendant's deadline to file their responses to July 2, 2021, which the Court granted. ECF Nos. 18 & 19.

5. On June 30, 2021, Plaintiff filed a Second Amended Complaint. ECF No. 22.

6. On July 2, 2021, Defendants filed their respective Special Motions to Dismiss Plaintiff's Second Amended Complaint ("Motions"). ECF Nos. 26 & 27.

7. Plaintiff's initial deadline to respond to Defendants' Motions was July 19, 2021.

8. On July 19, 2021, the parties jointly submitted a stipulation to extend Plaintiff's deadline to file responses to Defendants' Motions to August 27, 2021. ECF No. 30. On July 23, 2021, this Court granted the stipulation. ECF No. 31.

9. Plaintiff avers that he needs additional time to locate, organize, and review relevant documents and prepare the appropriate responses.

10. There are currently no scheduled hearings in this case. Plaintiff's sought extension will not unduly delay the proceedings.

11. Defendants do not oppose an extension up to and including September 17, 2021.

12. Accordingly, Plaintiff shall have until September 17, 2021, to file responses to Defendants' Motions.

IT IS SO STIPULATED.

DATED this 23rd day of August 2021

DATED this 23rd day of August 2021

**GORDON REES SCULLY
MANSUKHANI**

FERNANDO HARO III

/s/ Dione C. Wrenn

/s/ Fernando Haro

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Attorneys for Defendants

FERNANDO HARO III
P.O. Box 81972
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Plaintiff in Proper Person

IT IS SO ORDERED.



**ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE**

8/26/2021
DATED